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HONORABLE BRIAN D. LYNCH  
HEARING DATE: March 11, 2020  
TIME: 1:30 pm  
RESPONSE DATE: March 4, 2020  
Chapter 13  
Tacoma, WA

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT COURT OF WASHINGTON**

**Re**

**GLADYS NANJEKE KALIMUKWA**

**In Chapter 13 Proceeding**

**No. 19-43928-BDL**

**Debtor(s)**

**RESPONSE TO OBJECTION TO  
CONFIRMATION**

COMES NOW the above-referenced debtor(s) through their attorneys of record and states:

The Debtor agrees that this case is not ready for confirmation as the following issues still need to be resolved which are being worked on:

A. This case was previously a jointly filed case and is now an individual case.

There are claims (including the IRS claim) that the remaining debtor is not responsible for and will be objected to which will decrease the amount of priority debt. The objection will soon be reset for hearing and the case cannot be confirmed until those claims are resolved.

B. Toyota has objected to confirmation, however they are one of the claims for which the Debtor is not liable so that matter is yet to be resolved.

C. The Debtor has applied for a loan modification and the Debtor is hopeful to have a more accurate timeline once the letter acknowledging the receipt of the modification and the requirements going forward is received. Those

1 letters are usually received within 45 days.

2 D. Debtor has a wage deduction from her check and has now been provided  
3 with the information so she can send in the balance of what is not deducted  
4 from her wages. Her boyfriend who lives with her and is also on the house  
5 loan will contribute to the household in order to make the Plan work.  
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8 In order to resolve all issues and have time for the hearing to object to creditor  
9 claims it is requested that the confirmation hearing be continued to April 29,  
10 2020.

11 Dated March 4, 2020

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13 /s/ Ellen Ann Brown

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ELLEN ANN BROWN WSB#27992  
15 Attorneys for Debtor(s)  
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